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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

MATTHEW WADE BEASLEY; BEASLEY
LAW GROUP PC; JEFFREY J. JUDD;
CHRISTOPHER R. HUMPHRIES; J&J
CONSULTING SERVICES, INC., an Alaska
Corporation; J&J CONSULTING SERVICES,
INC., a Nevada Corporation; J AND J
PURCHASING LLC; SHANE M. JAGER;
JASON M. JONGEWARD; DENNY
SEYBERT; and ROLAND TANNER;

Defendants,

THE JUDD IRREVOCABLE TRUST; PAJ
CONSULTING INC; BJ HOLDINGS LLC;
STIRLING CONSULTING, L.L.C.; CJ
INVESTMENTS, LLC; JL2 INVESTMENTS,
LLC; ROCKING HORSE PROPERTIES,
LLC; TRIPLE THREAT BASKETBALL,
LLC; ACAC LLC; ANTHONY MICHAEL
ALBERTO, JR.; and MONTY CREW LLC;

Relief Defendants.

Case No. 2:22-cv-0612-CDS-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING THE
RECEIVER'S MOTION TO
COMPEL OR ALTERNATIVELY
ORDER TO SHOW CAUSE
[ECF NO. 91]**

Pursuant to LR 7-1, Rule 6(b) and LR IA 6-1, Defendant Jeffrey J. Judd (“**Judd**”), by and through his counsel of record, Kevin N. Anderson and Trevor R. Waite of the law firm of Fabian VanCott, together with Geoff Winkler, the Court-appointed Receiver (the “**Receiver**”), by and through his counsel of record, the law firm of Greenberg Traurig, LLP hereby enter into the following stipulation relating to the Receiver’s Motion to Compel or Alternative Motion for Order to Show Cause Why Jeffrey J. Judd and/or Those Acting on His Behalf Should Not be Held in Contempt for Failure to Comply With This Court’s Order Appointing Receiver Due to Failure to Turn Over Assets (the “Motion to Compel”) (ECF No. 91) as follows:

1. Fabian VanCott represents that, prior to the filing of this action, it had received from Defendant Jeffrey J. Judd \$750,000.00 and placed those funds in a trust account. Fabian VanCott further represents that none of those funds have been removed from that trust account to date.

2. Fabian VanCott seeks to retain \$345,378.73 in its trust account (IOLTA), which it further represents consists of \$137,475.00 (for services rendered as of April 13, 2022) and \$191,685.50 (for services rendered as of May 31, 2022) and costs incurred of \$16,218.23 as detailed in the Declaration of Kevin N. Anderson at ¶ 41 filed in support of Judd’s Motion (1) to Clarify Order Appointing Receiver, (2) for Release of Funds for Attorney’s Fees, or (3) Motion for Leave to Withdraw (ECF No. 114) (“Judd Motion”), and in the exhibits submitted *in camera* relating thereto. This amount shall remain in Fabian VanCott’s trust account (IOLTA) until further order of the Court authorizing the payment of Fabian VanCott’s fees or costs and/or requiring the money to be turned over to the Receiver.

3. Upon the Receiver’s receipt of \$404,621.27—the balance of the \$750,000.00 Fabian VanCott represents is currently held in trust, the Receiver will withdraw the Motion to

1 Compel, but reserves all rights, including the ability to file a similar motion at a later date.

2 4. Pending the transfer of funds and action referenced in paragraph 3 above, the parties
3 request that the Court not rule on the Motion to Compel.

4 5. The parties reserve all rights with respect to a) the \$404,621.27; b) the \$345,378.73
5 retained by Fabian VanCott; c) Judd Motion; d) any future applications for fees and costs brought
6 by counsel for the Receiver and/or Judd; and e) any requests regarding Mr. Judd's living expenses.

7 IT IS SO STIPULATED.

8 DATED this 1st day of July, 2022.

9 /s/ Kevin N. Anderson
10 KEVIN N. ANDERSON, ESQ.
FabianVanCott

11 *Attorneys for Jeffrey J. Judd*

12 GREENBERG TRAURIG, LLP

13 /s/ Kara B Hendricks (by KNA with permission)
14 KARA B. HENDRICKS, ESQ.
15 JASON K. HICKS, ESQ.
KYLE A. EWING, ESQ.

16 *Proposed Attorneys for Geoff Winkler, Receiver for*
17 *J&J Consulting Services, Inc., J&J Consulting*
18 *Services, Inc., J and J Purchasing LLC, The Judd*
19 *Irrevocable Trust, and BJ Holdings LLC*

20 IT IS SO ORDERED:

21 
22 ELAYNA J. YOUCHAH
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: July 1st, 2022